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Attorneys for Plaintiffs and the Certified Subclasses

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

STACIA STINER, et al., on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

BROOKDALE SENIOR LIVING, INC.;
BROOKDALE SENIOR LIVING
COMMUNITIES, INC.; and DOES 1 through 100,
Defendants.

Case No. 4:17-cv-03962-HSG (LB)

**DECLARATION OF GUY B.
WALLACE IN SUPPORT OF
PLAINTIFFS' REPLY TO
DEFENDANTS' DE FACTO
OPPOSITION TO MOTION FOR
REASONABLE ATTORNEYS' FEES,
COSTS AND EXPENSES**

Date: October 16, 2025
Time: 2:00 p.m.
Crtrm.: 2, 4th Floor

Judge: Hon. Haywood S. Gilliam, Jr.

1 I, Guy B. Wallace, hereby declare as follows,

2 1. I am a senior partner at the law firm of Schneider Wallace Cottrell Kim LLP
3 (“Schneider Wallace” or “SWCK”). I am a member in good standing of the bar of the State of
4 California. I am counsel of record for Plaintiffs and the certified subclasses (collectively referred
5 to as “Plaintiffs”). I have personal knowledge of the facts set forth in this Declaration and could
6 and would testify competently to them.

7 2. I am co-counsel, along with Rosen Bien Galvan & Grunfeld LLP (“RBGG”),
8 Stebner Gertler & Guadagni (“the Stebner firm”) and Marks, Balette, Young & Moss (“MBYM”),
9 represent Plaintiffs and the certified subclasses herein.

10 3. I am submitting this Declaration in support of Plaintiffs’ Reply to Defendants’ De
11 Facto Opposition to Motion for Reasonable Attorneys’ Fees, Costs and Expenses.

12 4. Attached hereto as **Exhibit 1** is a true and correct copy of a document produced in
13 this litigation bearing Bates numbers BKD0027044 – BKD0027076, a Brookdale Residency
14 Agreement revised in June 2015.

15 5. Attached hereto as **Exhibit 2** is a true and correct copy of a document previously
16 filed in this litigation at ECF 238-4 (Declaration of Kevin Bowman in Support of Defendants’
17 Motion to Deny Class Certification), Exhibit C, a template Brookdale Residency Agreement dated
18 October 2016.

19 5. Attached hereto as **Exhibit 3** is a true and correct copy of a document previously
20 filed in this litigation at ECF 238-4 (Declaration of Kevin Bowman in Support of Defendants’
21 Motion to Deny Class Certification), Exhibit D, a template Brookdale Residency Agreement dated
22 January 2017.

23 6. Attached hereto as **Exhibiti 4** is a true and correct copy of a document previously
24 filed in this litigation at ECF 238-4 (Declaration of Kevin Bowman in Support of Defendants’
25 Motion to Deny Class Certification), Exhibit E, a template Brookdale Residency Agreement dated
26 June 2018.

27 7. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced in
28 this litigation bearing Bates numbers BKD3315703 – BKD3315731, a Brookdale Residency

1 Agreement revised in September 2024.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct.

4 Executed on August 28, 2025 at Emeryville, California.

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6
7
8 /s/ Guy B. Wallace
Guy B. Wallace